

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**BERNETTA WILLIS**

**a/k/a Nettie, Hi-Girl, LaShay**

**CR. NO. 2:06cr0071-MEF**

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**United States' Motion for Extension of Time  
to File Response to Order to Show Cause**

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The United States respectfully moves the Court to grant a brief continuance of time for it to prepare and file its response to Bernetta Willis's Motion to Modify Conditions of Supervision (Doc. 56) and the Court's Order to Show Cause (Doc. 57). The United States requests this relief for the following reasons:

1. The assigned Assistant United States Attorney for this case, Christopher Snyder, is required to attend the Department of Justice's Criminal Division's Hurricane Katrina Fraud Task Force Conference in New Orleans, Louisiana. The conference is set for September 13, 2006.

2. Currently, AUSA Snyder is the Middle District's primary contact for all Hurricane Katrina fraud cases and has been mandated to attend this conference on behalf of the Middle District. In order to provide sufficient travel time from Montgomery to New Orleans, AUSA Snyder will have to be out of the Middle District on the afternoon of September 12, 2006, and most of September 14, 2006.

3. Additionally, in preparing its Response, the United States must consult with agents of the Department of Homeland Security in Atlanta and the U.S. Postal Inspector's Service in Mobile. In turn, these agents will need time to request documents to support the United States' position.

4. AUSA Snyder is aware that when the Court issues Orders to Show Cause, it must consider, among other things, the home monitoring system's effect on the defendant and her minor children. In light of this, the United States would request a continuance to no later than September 18, 2006.

5. AUSA Snyder has left a voice mail message with Ms. Willis's attorney, Tim Halstrom, and, consequently, is unable to state Mr. Halstrom's position to this motion for continuance.

Based on the facts stated above, the United States respectfully requests that the Court grant a brief continuance in this matter.

Respectfully submitted this 12th day of September, 2006.

LEURA G. CANARY  
UNITED STATES ATTORNEY

/s/ Christopher Snyder  
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CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Tim Halstrom.

/s/ Christopher Snyder  
CHRISTOPHER A. SNYDER  
Assistant United States Attorney